

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

PRECISION PIPELINE, LLC,)	
)	
<i>Plaintiff,</i>)	
)	
v.)	Civil Action No. 3:16cv00180 (JAG)
)	
DOMINION TRANSMISSION, INC.,)	
)	
<i>Defendant.</i>)	
_____)	

DOMINION TRANSMISSION, INC.'S RESPONSE TO MOTION TO SEAL

Defendant Dominion Transmission, Inc. ("Dominion"), by counsel, submits this response to Plaintiff Precision Pipeline, LLC's ("Precision") Motion to Seal:

1. Pursuant to Fed. R. Civ. P. Rule 10(c), Dominion adopts and incorporates by references its Opposition to Precision's Motion to Compel Deposition in response to Precision's Motion to Seal.

2. Without waiving any of the arguments raised in Dominion's Opposition to Precision's Motion to Compel Deposition (1/18/2018 Dominion Opp'n To Mot. to Compel, ECF No. 150), Dominion joins in with Precision's request to file under seal the document identified as Exhibit 3 to Precision's Memorandum in Support of its Motion to Compel Deposition.

3. Exhibit 3 was identified as Confidential pursuant to the Parties' Stipulated Protective Order (ECF No. 79) and Dominion agrees that Exhibit 3 should be filed under seal.

4. For these reasons, Dominion respectfully joins in Precision's request that the Court file Exhibit 3 under seal.

Dated January 18, 2018

Respectfully Submitted,

DOMINION TRANSMISSION, INC.

By Counsel

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CERTIFICATE OF SERVICE

I certify that on this 18th day of January, 2018, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF System which will then send a notification of such filing (NEF) to the following:

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